

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Yong Woo Choi, individually and
on behalf of all others similarly
situated,

Plaintiff,
-against-

ANSWER
20-CV-857

Rausch, Sturm, Israel, Enerson &
Hornik LLP d/b/a Rausch Sturm,
Galaxy Purchasing, LLC and
Worldwide Asset Purchasing II,
LLC,

Defendant.

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Defendants GALAXY PURCHASING, LLC and WORLDWIDE ASSET
PURCHASING II, LLC, by their attorneys, Barron & Newburger, P.C., answers
plaintiff's complaint as follows:

1. Defendants acknowledge being sued pursuant to the Fair
Debt Collection Practices Act (FDCPA), but denies any violation thereof.

2. Defendants admit the allegations contained in paragraph
"2" of the complaint.

3. Defendants admit the allegations contained in paragraph
"3" of the complaint.

4. Defendants admit the allegations contained in paragraph
"4" of the complaint.

5. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "5" of the complaint.

6. Defendants admit the allegations contained in paragraph "6" of the complaint.

7. Defendants admit the allegations contained in paragraph "7" of the complaint.

8. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

9. Defendant admit the allegations contained in paragraph "9" of the complaint.

10. Defendant admit the allegations contained in paragraph "10" of the complaint.

11. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

12. Defendants admit the allegations contained in paragraph "12" of the complaint.

13. Defendants admit the allegations contained in paragraph "13" of the complaint.

14. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

15. Defendants admit the allegations contained in paragraph "15" of the complaint.

16. Defendants admit the allegations contained in paragraph "16" of the complaint.

17. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

18. Defendants admit the allegations contained in paragraph "18" of the complaint

19. Defendants admit the allegations contained in paragraph "19" of the complaint.

20. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

21. Defendants deny each and every allegation contained in paragraph "21" of the complaint.

22. Defendants deny each and every allegation contained in paragraph "22" of the complaint.

23. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

24. Defendants admit the allegations contained in paragraph "24" of the complaint.

25. Defendants admit the allegations contained in paragraph "25" of the complaint.

26. Defendants admit the allegations contained in paragraph "26" of the complaint.

27. Defendants admit the allegations contained in paragraph "27" of the complaint.

28. Defendants admit the allegations contained in paragraph "28" of the complaint.

29. Defendants admit the allegations contained in paragraph "29" of the complaint.

30. Defendants admit the allegations contained in paragraph "30" of the complaint.

31. Defendants admit the allegations contained in paragraph "31" of the complaint.

32. Defendants admit the allegations contained in paragraph "32" of the complaint.

33. Defendants admit the allegations contained in paragraph "33" of the complaint

34. Defendants admit the allegations contained in paragraph "34" of the complaint.

35. Defendants admit the allegations contained in paragraph "35" of the complaint.

36. Defendant deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "36" of the complaint.

37. Defendants deny each and every allegation contained in paragraph "37" of the complaint.

38. Defendants deny each and every allegation contained in paragraph "38" of the complaint.

39. Defendants deny each and every allegation contained in paragraph "39" of the complaint.

40. Defendants repeat and reallege their previous admissions and denials contained in paragraphs "1" through "39" of the complaint.

41. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

42. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

43. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

44. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

45. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

46. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

47. Defendants admit the allegations contained in paragraph "47" of the complaint.

48. Defendants deny each and every allegation contained in paragraph "48" of the complaint.

49. Defendants deny each and every allegation contained in paragraph "49" of the complaint.

50. Defendants deny each and every allegation contained in paragraph "50" of the complaint.

51. Defendants deny each and every allegation contained in paragraph "51" of the complaint.

52. Defendants deny each and every allegation contained in paragraph "52" of the complaint.

53. Defendants deny each and every allegation contained in paragraph "53" of the complaint.

54. Defendants deny each and every allegation contained in paragraph "54" of the complaint.

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56. Defendants deny each and every allegation contained in paragraph "56" of the complaint.

57. Defendants deny each and every allegation contained in paragraph "57" of the complaint.

58. Defendants deny each and every allegation contained in paragraph "58" of the complaint.

59. Defendants deny each and every allegation contained in paragraph "59" of the complaint.

60. Defendants deny each and every allegation contained in paragraph "60" of the complaint.

61. Defendants repeat and reallege their previous admissions and denials contained in paragraphs "1" through "60" of the complaint.

62. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

63. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

64. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

65. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

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69. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

70. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

71. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

72. This paragraph contains no factual allegations directed against the answering defendants and does not require an admission or denial.

73. Defendants deny each and every allegation contained in paragraph "73" of the complaint

74. Defendants deny each and every allegation contained in paragraph "74" of the complaint.

75. Defendants deny each and every allegation contained in paragraph "75" of the complaint.

76. Defendants deny each and every allegation contained in paragraph "76" of the complaint.

77. Defendants deny each and every allegation contained in paragraph "77" of the complaint.

78. Defendants deny each and every allegation contained in paragraph "78" of the complaint.

79. Defendant deny each and every allegation contained in paragraph "79" of the complaint.

80. Defendants deny each and every allegation contained in paragraph "80" of the complaint.

81. Defendants deny each and every allegation contained in paragraph "81" of the complaint.

82. Defendants deny each and every allegation contained in paragraph "82" of the complaint.

83. Defendants deny each and every allegation contained in paragraph "83" of the complaint.

84. Defendants deny each and every allegation contained in paragraph "84" of the complaint.

85. Defendants acknowledge plaintiff's efforts to bring this matter as a class action, but deny any violation of the FDCPA and deny that this matter is suitable for class certification.

86. Defendants acknowledge plaintiff's efforts to bring this matter as a class action, but deny any violation of the FDCPA and deny that this matter is suitable for class certification.

87. Defendants deny each and every allegation contained I paragraph "87" of the complaint.

88. Defendants deny each and every allegation contained in paragraph "88" of the complaint.

89. Defendants deny each and every allegation contained in paragraph "89" of the complaint.

90. Defendants deny each and every allegation contained in paragraph "90" of the complaint.

91. Defendants deny each and every allegation contained in paragraph "91" of the complaint.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY
April 6, 2020



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